

CITATION
STATE OF LOUISIANA

RISA COCO ETVIR

vs

DG LOUISIANA ETAL

27th JUDICIAL DISTRICT COURT

PARISH OF ST. LANDRY

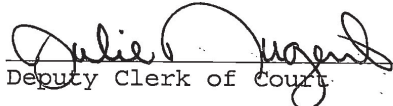
CIVIL NO. 21-C-2212-C

TO THE DEFENDANT DG LOUISIANA, LLC, THROUGH CORPORATION SERVICE
COMPANY, 501 LOUISIANA AVENUE, BATON ROUGE, LA 70802

You are hereby summoned to comply with the demand contained in the petition/of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, in the 27th Judicial District Court in and for the Parish of St. Landry, State of Louisiana, within fifteen (15) days after the service hereof, under penalty of default.

Witness the Honorable the Judges of said Court, this 31ST
day of AUGUST, A. D. 2021.

Issued and delivered September 1, 2021


Deputy Clerk of Court

REQUESTED BY: KARNINA D. KING (Pl)

EXHIBIT A

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VS

DG LOUISIANA ETAL

27th JUDICIAL DISTRICT COURT

PARISH OF ST. LANDRY

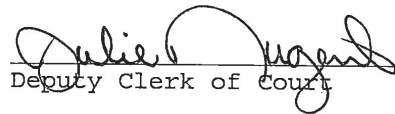
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Deputy Clerk of Court

REQUESTED BY: KARNINA D. KING (P1)

RISA COCO AND JONTY COCO

27TH JUDICIAL DISTRICT COURT

VERSUS

DOCKET NO. 21-C-2212-CDG LOUISIANA, LLC, AND
ABC INSURANCE COMPANY

ST. LANDRY PARISH, LOUISIANA

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel comes **RISA COCO** and **JONTY COCO**, a person of the full age of majority and a resident of St. Landry Parish, State of Louisiana, who for their Petition for Damages does aver and say that:

1.

Made **DEFENDANTS** herein are:

- A. **DG LOUISIANA, LLC**, a foreign limited liability company licensed to do and doing business in the State of Louisiana; and
- B. **ABC INSURANCE COMPANY**, upon information and belief, a foreign owned insurance company licensed to do and doing business in the State of Louisiana, which is made a defendant herein pursuant to Louisiana's Direct Action Statute.

2.

Plaintiff, **RISA COCO**, on June 19, 2020, was a customer at **DG LOUISIANA, LLC**, located at 169 Oak Tree Park Drive, Sunset, Louisiana. As she was walking down the aisle, she slipped and fell in a puddle of a liquid substance.

3.

Upon information and belief, at the time of the subject accident, the facility was understaffed and the employees failed to maintain proper inspection procedures.

4.

Plaintiff's fall was caused by the floor being maintained in an unsafe condition in that there was a liquid substance on the floor. Defendant failed to warn of the dangerous condition of which they should have known of had they reasonably inspected the premises. Further, Defendant knew or should have known that liquid substances was near and, in the aisle, and failed to mitigate the risk of harm to customers such as Plaintiff.

5.

The acts of fault, gross and wanton negligence, and under theory of strict liability, by **DG LOUISIANA, LLC**, are the proximate cause of injury, and damages sustained by plaintiff.

UN 16/21 PM2:05
ST. LANDRY COC

St. Landry Parish Clerk of Court's Office

Filed 6-16-2021Louis Gaudin

Dy. Clerk

OPELOUSAS, LOUISIANA 9-1-2021

This is to certify that the above is a true and correct copy of the original on file in the office of the Clerk of Court of St. Landry Parish.

Julie Gaudin
Deputy Clerk of Court

6.

With all times relevant, Defendants, upon information and belief, **ABC INSURANCE COMPANY** insured Defendant **DG LOUISIANA, LLC** and are responsible for the damages caused to Plaintiff as a result of the above-mentioned negligent conduct of Defendant, **DG LOUISIANA, LLC**.

7.

Plaintiff, **RISA COCO**, suffered past, present and future pain and suffering, medical expenses, permanent disability, loss of income, loss of enjoyment of life, and other losses to be determined at trial.

8.

Plaintiff's husband, **JONTY COCO** has suffered mental anguish and loss of consortium due to Plaintiff's injuries.

WHEREFORE Plaintiffs pray that the Defendants be served with citation herein and after due hearings, there be judgment in their favor and against the Defendants for all just and equitable relief to include damages for personal injury, lost wages, past, present, and future medical expenses, pain and suffering, loss of consortium, and costs.

RESPECTFULLY SUBMITTED:

PLEASE WITHHOLD SERVICE.



JOHN W. MILTON, Bar Roll # 19066
KARNINA D. KING, Bar Roll #35463
RYAN ELTON KING, Bar Roll #39489
King Milton Law Group, L.L.C.
213 East Willow Street (70501)
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Lafayette, Louisiana 70509
Tel: (337) 548-3030; Fax: (888) 489-5089
E-Mail: jmilton@kingmiltonlaw.com
kking@kingmiltonlaw.com

St. Landry Parish Clerk of Court's Office

Filed



Dy. Clerk

OPELOUSAS, LOUISIANA 9.1.2021
This is to certify that the above is a true and correct copy of the original on file in the office of the Clerk of Court of St. Landry Parish.

Deputy Clerk of Court

RISA COCO AND JONTY COCO

27TH JUDICIAL DISTRICT COURT

VERSUS

DOCKET NO. 21C2212C

DG LOUISIANA, LLC, AND
ABC INSURANCE COMPANY

ST. LANDRY PARISH, LOUISIANA

VERIFICATION

STATE OF LOUISIANA

PARISH OF LAFAYETTE

BEFORE ME, the undersigned authority, duly commissioned, qualified, and sworn in
and for the State and Parish aforesaid,

PERSONALLY CAME AND APPEARED:

RISA COCO and JONTY COCO

who after first being duly sworn, did depose and state that all of the allegations on the foregoing
Petition are true and correct to the best of their knowledge and belief.

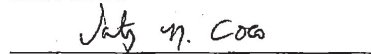
Done and passed at Lafayette, Louisiana, this 16th day of June, 2021, in
the presence of competent witnesses, who sign with appearer and me, officer, after due reading
of the whole.

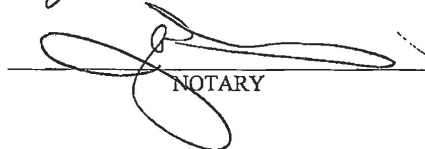
WITNESSES:


STAR THOMAS


KARNINA KING


RISA COCO

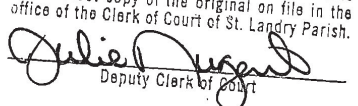

JONTY-COCO


NOTARY

St. Landry Parish Clerk of Court's Office

Filed 6-16-21


Dy. Clerk

OPELOUSAS, LOUISIANA 9-1, 2021
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Deputy Clerk of Court